

**From:** [Holloman, Rachel](#)  
**To:** [Goodis, Michael](#); [Rosenblatt, Daniel](#); [Davis, Donna](#)  
**Subject:** FW: Prop 65 Desk Statement  
**Date:** Friday, March 30, 2018 1:02:02 PM  
**Attachments:** [Prop 65 desk statement 20180320 final.docx](#)

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I have been told by FEAD that this is the final desk statement with the information that we should use should we have inquiries on this issue.

Dan asked for some bullets on what we would discuss with DPR, OEHHA and OPP. Let me know if you agree with the bullets below:

- While the Agency support proper warning of any potential harm that maybe caused by a pesticide, the major goal of these discussions is to develop a process for addressing areas where the USEPA science is not in agreement with the studies selected by OEHHA to support Prop. 65 warnings.
- In addition, we will address the comments made by DPR and determine how the Prop. 65 warnings can only appear on the CA label.
- These goals should be achieved in a manner that does not inhibit products from getting to market.

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**From:** Kadeli, Annie  
**Sent:** Tuesday, March 20, 2018 8:21 AM  
**To:** Holloman, Rachel <[Holloman.Rachel@epa.gov](mailto:Holloman.Rachel@epa.gov)>  
**Subject:** RE: Prop 65 Desk Statement

Hi Rachel,

It's up with OCSPP IO for their two cents. Attached is the latest.

Thanks,

Annie

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**From:** Holloman, Rachel  
**Sent:** Wednesday, March 14, 2018 9:40 AM  
**To:** Kadeli, Annie <[Kadeli.Annie@epa.gov](mailto:Kadeli.Annie@epa.gov)>  
**Subject:** RE: Prop 65 Desk Statement  
Attachment is missing

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**From:** Kadeli, Annie  
**Sent:** Wednesday, March 14, 2018 9:07 AM  
**To:** Perlis, Robert <[Perlis.Robert@epa.gov](mailto:Perlis.Robert@epa.gov)>; Holloman, Rachel <[Holloman.Rachel@epa.gov](mailto:Holloman.Rachel@epa.gov)>; Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>  
**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Pahel, Lisa <[Pahel.Lisa@epa.gov](mailto:Pahel.Lisa@epa.gov)>  
**Subject:** RE: Prop 65 Desk Statement  
Bob and Rachel – thanks for taking a look and providing your feedback!

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**From:** Perlis, Robert  
**Sent:** Tuesday, March 13, 2018 2:17 PM  
**To:** Kadeli, Annie <[Kadeli.Annie@epa.gov](mailto:Kadeli.Annie@epa.gov)>; Holloman, Rachel <[Holloman.Rachel@epa.gov](mailto:Holloman.Rachel@epa.gov)>; Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>  
**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Pahel, Lisa <[Pahel.Lisa@epa.gov](mailto:Pahel.Lisa@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** RE: Prop 65 Desk Statement

Annie:

My comments are in the attached – happy to discuss if you have any questions.

Bob

Bob Perlis

Pesticides and Toxic Substances Law Office

Office of General Counsel

US EPA

(202) 564-5636

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**From:** Kadeli, Annie

**Sent:** Tuesday, March 13, 2018 10:27 AM

**To:** Holloman, Rachel <[Holloman.Rachel@epa.gov](mailto:Holloman.Rachel@epa.gov)>; Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>; Perlis, Robert <[Perlis.Robert@epa.gov](mailto:Perlis.Robert@epa.gov)>

**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Pahel, Lisa <[Pahel.Lisa@epa.gov](mailto:Pahel.Lisa@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Subject:** RE: Prop 65 Desk Statement

As promised, some more changes!

Bob (in Erin's absence) – checking to make sure OGC is ok with this new version.

Rachel – please let me know if these changes are ok from RD's side. Meaning has not really changed.

The IO just wanted a few different places of wording and they added additional info into the background section.

Thanks,

Annie

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**From:** Kadeli, Annie

**Sent:** Tuesday, March 13, 2018 7:45 AM

**To:** Holloman, Rachel <[Holloman.Rachel@epa.gov](mailto:Holloman.Rachel@epa.gov)>; Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>

**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Pahel, Lisa <[Pahel.Lisa@epa.gov](mailto:Pahel.Lisa@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Subject:** RE: Prop 65 Desk Statement

Erin – thanks

Rachel – I agree with your proposed changes. Let's give this version a shot. I'll reach out again for your input if there are any more substantive comments/concerns.

Thanks,

Annie

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**From:** Holloman, Rachel

**Sent:** Monday, March 12, 2018 10:28 AM

**To:** Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>; Kadeli, Annie <[Kadeli.Annie@epa.gov](mailto:Kadeli.Annie@epa.gov)>

**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Pahel, Lisa <[Pahel.Lisa@epa.gov](mailto:Pahel.Lisa@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Subject:** RE: Prop 65 Desk Statement

Hi Annie, I was out of the office of Friday and I made some changes this morning. Please see attached.

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**From:** Koch, Erin

**Sent:** Friday, March 09, 2018 11:23 AM

**To:** Kadeli, Annie <[Kadeli.Annie@epa.gov](mailto:Kadeli.Annie@epa.gov)>; Holloman, Rachel <[Holloman.Rachel@epa.gov](mailto:Holloman.Rachel@epa.gov)>

**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>

**Subject:** RE: Prop 65 Desk Statement

I've added one comment. But ultimately, I'm just reviewing for accuracy and OPP needs to decide what the message should be.

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**From:** Kadeli, Annie

**Sent:** Friday, March 09, 2018 11:15 AM

**To:** Holloman, Rachel <[Holloman.Rachel@epa.gov](mailto:Holloman.Rachel@epa.gov)>; Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>

**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>

**Subject:** FW: Prop 65 Desk Statement

Hi Rachel and Erin,

We received the feedback from the IO in the forwarded email below. In an effort to answer Debby's questions and clarify our intent, I made some changes (in tracked changes). Please take a look and see if this answers Debby's questions to your satisfaction. Happy to look at any other suggestions you may have as well.

Thanks,

Annie

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**From:** Sisco, Debby

**Sent:** Thursday, March 08, 2018 3:01 PM

**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Kadeli, Annie <[Kadeli.Annie@epa.gov](mailto:Kadeli.Annie@epa.gov)>

**Cc:** Dinkins, Darlene <[Dinkins.Darlene@epa.gov](mailto:Dinkins.Darlene@epa.gov)>

**Subject:** FW: Prop 65 Desk Statement

Do we know what warning California is requiring? Cancer? Or birth defects/other repro harm? I had assumed it was cancer, but this doesn't say. Shouldn't it? And if so, it seems like we should say what our conclusions are. It seems to me this raises more questions than it answers.

*Debby Sisco*

Ethics Officer and Special Assistant to the Director

Office of Pesticide Programs (7501P)

US Environmental Protection Agency

4<sup>th</sup> floor - 4241 Potomac Yard South

(office: 703 308-8121; Mobile: 571 317-4823)

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**From:** Herndon, George

**Sent:** Thursday, March 8, 2018 12:33 PM

**To:** Sisco, Debby <[Sisco.Debby@epa.gov](mailto:Sisco.Debby@epa.gov)>; Dinkins, Darlene <[Dinkins.Darlene@epa.gov](mailto:Dinkins.Darlene@epa.gov)>

**Cc:** Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Kadeli, Annie <[Kadeli.Annie@epa.gov](mailto:Kadeli.Annie@epa.gov)>; Naimy, Nina <[Naimy.Nina@epa.gov](mailto:Naimy.Nina@epa.gov)>

**Subject:** FW: Prop 65 Desk Statement

Debby and Darlene,

On behalf of FEAD management, I approve the wording in the following desk statement on Prop 65 and glyphosate. Let me know if you have any questions or concerns.

Jeff

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**From:** Kadeli, Annie

**Sent:** Thursday, March 08, 2018 10:43 AM

**To:** Herndon, George <[Herndon.George@epa.gov](mailto:Herndon.George@epa.gov)>; Mosby, Jackie <[Mosby.Jackie@epa.gov](mailto:Mosby.Jackie@epa.gov)>

**Cc:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Naimy, Nina <[Naimy.Nina@epa.gov](mailto:Naimy.Nina@epa.gov)>

**Subject:** Prop 65 Desk Statement

Hi Jeff and Jackie,

Please see attached the Prop 65 desk statement on the preliminary injunction that Nancy and Rick asked for. Mike Goodis and Erin Koch (OGC) have approved it. CSB requests your review. Once you concur, please send along to the IO, with a CC to Kaythi Han, Nina Naimy, and me.

Thanks,

Annie

**Annie Kadeli**

Communication Services Branch

Field & External Affairs Division

Office of Pesticide Programs

U.S. Environmental Protection Agency

(703) 347-0370